U UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

KAREN HUNT,

Plaintiff,

V.

Case No. 1:23-cv-00491-RJJ-SJB

UNITED DEBT SETTLEMENT, LLC,

Defendant.

MOTION FOR LEAVE TO APPEAR TELEPHONICALLY FOR THE RULE 16 SCHEDULING CONFERENCE

NOW COMES Plaintiff, KAREN HUNT ("Plaintiff"), , by and through her attorneys, Consumer Law Partners, LLC, bringing this Motion for Leave to Appear Telephonically for the Rule 16 Scheduling Conference:

- On July 13, 2023, this Honorable Court entered an Order setting a Rule 16 scheduling conference for August 18, 2023 at 2:00 p.m. before Judge Robert J. Jonker in Grand Rapids, Michigan [Doc. 6].
- 2. Lead counsel for Plaintiff is located in Chicago, Illinois, while Defendant's lead counsel is based in Summit, New Jersey. As such, counsel will have to travel by air to attend the case management conference.
- 3. Plaintiff understands that the Court's practice is to require lead trial counsel to physically appear for the scheduling conference. However, since this case involves a single party consumer, Plaintiff requests that deference be given to keeping costs as low as possible. Plaintiff makes this request to avoid the expense of having local counsel travel and appear for this hearing.

- 4. Furthermore, Plaintiff's counsel file cases throughout the United States, and as such, he regularly appears telephonically in front of Courts and is familiar with the process and appropriate decorum. Counsel fully understands that appearing telephonically is no different than a physical appearance before the Judge. If this Motion is granted, counsel will ensure that he is fully prepared to attend this hearing via telephone or video conferencing.
- 5. Allowing counsel to appear telephonically for the initial pretrial and scheduling conference will reduce attorney fees and promote economy on all levels.

WHEREFORE, Plaintiff, KAREN HUNT, respectfully requests that this Honorable Court allow Plaintiff's counsel to appear telephonically for the upcoming Rule 16 scheduling conference.

DATED this 1st day of August, 2023.

Respectfully Submitted,

/s/ Taxiarchis Hatzidimitriadis

Taxiarchis Hatzidimitriadis #6319225 CONSUMER LAW PARTNERS, LLC 333 N. Michigan Ave., Suite 1300 Chicago, Illinois 60601 (267) 422-1000 (phone) (267) 422-2000 (fax) teddy@consumerlawpartners.com

Attorney for Plaintiff, Karen Hunt

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on August 1, 2023, a copy of the foregoing was filed electronically via CM/ECF with the United States District Court, Western District of Michigan, with notification being sent electronically to all counsel of record.

/s/ Taxiarchis Hatzidimitriadis
Taxiarchis Hatzidimitriadis